

Exhibit B

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

IN RE:

WC MANHATTAN PLACE
PROPERTY, LLC,

Debtor.

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CASE NO. 22-10047-TMD-11

Chapter 11

VERIFIED STATEMENT OF DWAYNE M. MURRAY

I, Dwayne M. Murray, pursuant to 28 U.S.C. § 1746, hereby declare, under penalty of perjury:

1. I am Dwayne M. Murray, serving my 28th years as a trustee for the Office of the United States Trustee, Region V. I serve as a Chapter 7 Trustee, SubV Trustee, Liquidator, Chapter 11 Trustee and as a Special Master for the 19th Judicial District, Parish of East Baton Rouge, State of Louisiana. I am licensed to practice before the Middle, Eastern, and Western Districts of LA, the United States Court of Appeals for the Fifth Circuit, and the United States Supreme Court. I am a *Fellow* of the American College of Bankruptcy, recipient of the Michelle Mendez Serviam Award presented by the Center for American and International Law in recognition of extraordinary contributions to others in the bankruptcy profession and the community, taught the bankruptcy law course at the Southern University Law Center of 21 years, a *Master* in the Jerry A. Brown Louisiana Bankruptcy American Inn of Court, a member of the American Bankruptcy Institute, the Turnaround Management Association, and a former President of the National Association of Bankruptcy Trustees. I have no association with the debtor, its creditors, members or parties in interest.

2. I submit this verified statement (the "Verified Statement") in connection with my appointment as Chapter 11 Trustee in the above-captioned Chapter 11 case (the "Chapter 11 Case") of WC Manhattan Place Property, LLC ("Debtor") pursuant to section 1104 of title 11 of the United States Code (the "Bankruptcy Code") and Rules 2007.1 and 5002 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

3. The facts set forth herein are based upon my personal knowledge, my review of the list of 20 largest unsecured creditors, the Schedules, Statements, and Summary, this list of creditors, amended list of creditors, and the list of Equity Security Holders. I will supplement this Verified Statement if additional information becomes available during the pendency of this Chapter 11 Case.

4. In preparing this Statement, I reviewed pleading filed in the case, reviewed the list of creditors, and my firm's client's list. I performed the following actions to identify the parties relevant to the Chapter 11 Case and to ascertain the connections, if any, to such parties:

(a) I compared the names of (i) the Debtor; (ii) the Debtor's affiliates; (iii) the Debtor's creditors included in the Debtor's Schedules; (iv) personnel at the Office of the United States Trustee;

(v) current service list maintained by the Court; and (vi) the docket for other creditors and parties-in-interest with the clients the Client has worked for or consulted.

5. I do not have any connections with the Debtor, any of the Debtor's creditors, any other parties in interest in the Chapter 11 Case, its respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee except as follows: NONE

6. I discovered no connection with any party in this case or its affiliated cases.

7. To assist me in the performance of my duties as Chapter 11 Trustee in the Chapter 11 Case, I may file with the Court applications to retain professionals I deem necessary if approved by the Court. I anticipate hiring: Louis M. Phillips of Kelly Hart & Pitre, 301 Main Street Suite 1600, Baton Rouge, Louisiana 70801.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 29, 2022



Dwayne M. Murray